

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JOHNNY KIMBLE,

Plaintiff,

v.

Case No. 07-C-0266

WISCONSIN DEPARTMENT OF
WORKFORCE DEVELOPMENT, and
JOHN DOE I, JOHN DOE II, JANE DOE I,
JANE DOE II,
Individually,
and in their official capacities,

Defendants.

DEFENDANT DEPARTMENT OF WORKFORCE DEVELOPMENT'S
TRIAL EXHIBITS

The Defendant Department of Workforce Development may introduce some of the following exhibits at trial on the issue of liability.

1. Department of Workforce Development personnel files of plaintiff Johnny Kimble, Jr., Jim Chichino, Georgiana Taylor and/or Mike Dixon;
2. Defendant's responses with attachments;
3. Provisions for Administering the Discretionary Compensation Adjustment (DCA);
4. J. Sheehan Donoghue Summary Judgment attachments;
5. Summary Judgment Affidavit of Johnny Kimble;
6. Leanna Ware Summary Judgment documents regarding plaintiff;

7. Plaintiff's Responses to Defendants First Interrogatories and Requests for Production of Documents plus attachments;

8. Department of Workforce Development Organization Chart;

9. Equal Rights Division Supervisory Personnel 1998-2003;

10. List of ERD Supervisors 1998-2003 eligible for Discretionary Compensation Awards;

11. Plaintiff's ERD Complaint (4-21-05);

12. State of Wisconsin Compensation Plan 1999-2001;

13. Summary Judgment documents submitted by Attorney Lewison.

Defendant Department of Workforce Development reserves the right to introduce any of the exhibits listed by the Plaintiff Johnny Kimble.

Dated this 29th day of June, 2009.

Respectfully submitted,

J.B. VAN HOLLEN
Attorney General

/s/ John R. Sweeney
JOHN R. SWEENEY
Assistant Attorney General
State Bar #1003066

Attorneys for Defendant DWD

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608)-264-9457
(608) 267-8906 (Fax)
sweeneyjr@doj.state.wi.us